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Attorney for Petitioner United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES,

Plaintiff,

v.

BABAK BROUMAND AND
MALAMATENIA MAVROMATIS,

Defendants.

Case No. CR-21-00162-WHO

**STIPULATION TO CONTINUE
STATUS CONFERENCE FROM MAY
8, 2025 AT 1:30 P.M., TO JULY 31,
2025 at 1:30 P.M. AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL
ACT; AND [PROPOSED] ORDER**

STIPULATION

The parties hereby stipulate that the currently set status conference be continued from
May 8, 2025, at 1:30 p.m. to July 31, 2025, at 1:30 p.m.

1 1. Defendant BABAK BROUMAND is in custody of the Bureau of Prisons in
2 Alabama after being convicted at jury trial in the related case of *United States v. Broumand*, 20-
3 224-RGK(A).

4 2. The government has produced over 60,000 pages of discovery to defendant
5 MAVROMATIS, which primarily consists of business records, including bank, credit card,
6 mortgage broker, title company, and escrow company records, tax returns, and witness
7 interview reports.

8 3. On March 24, 2022, the government obtained a superseding indictment in this
9 case adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in
10 which she was charged with two counts of False Statements on a Loan Application in
11 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's
12 indictment, co-defendant BABAK BROUMAND had already been charged.

13 4. The parties have reached an agreement on a proposed resolution and need
14 additional time to document their agreement for the Court's consideration. Accordingly, in
15 addition to the reasons outline below, the government and defense counsel agree that time is
16 excludable because of the Court's "consideration...of [the] proposed plea agreement to be
17 entered into by the [parties]." 18 U.S.C. § 3161(h)(1)(G). The government will file the plea
18 agreement, and diversion paperwork, well in advance of the July 31, 2025 hearing.

19 6. Therefore, the parties stipulate and agree that excluding time until July 31, 2025,
20 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The
21 parties further stipulate and agree that the ends of justice served by excluding the time from
22 May 8, 2025, through July 31, 2025 from computation under the Speedy Trial Act outweigh

1 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),
 2 (B)(iv).

3 7. Accordingly, the parties ask that the Court to continue the status conference to July
 4 31, 2025, and that the Court convert the status conference to a Change of Plea hearing once
 5 the government files the plea agreement.
 6

7 8. The undersigned Assistant United States Attorneys certify that they have obtained
 8 approval from all counsel to file this stipulation and proposed order.

9 IT IS SO STIPULATED.

10 DATED: May 6, 2025

11 /s/ Juan M. Rodriguez
 12 MICHAEL J. MORSE
 13 JUAN M. RODRIGUEZ
 Special Assistant United States Attorney

14 DATED: May 6, 2025

15 /s/ Steven F. Gruel
 16 STEVEN F. GRUEL
 Counsel for Defendant BROUMAND

17 DATED: May 6, 2025

18 /s/ Paul H. Nathan
 19 PAUL H. NATHAN
 Counsel for Defendant MAVROMATIS

20 ~~[PROPOSED]~~ ORDER

21 Based upon the facts set forth in the stipulation of the parties and for good cause shown,
 22 the Court hereby continues the status conference from May 8, 2025, at 1:30 p.m. to August
 23 7, 2025 at 1:30 p.m.

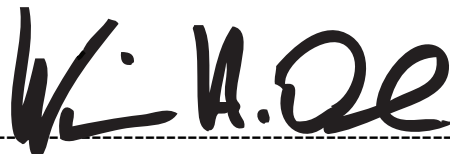
24 Furthermore, the Court finds that failing to exclude the time from May 8, 2025,
 25 through August 7, 2025, would unreasonably deny defense counsel and the defendant the
 26 reasonable time necessary for effective preparation, taking into account the exercise of due
 27 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).
 28

1 The Court further finds that the ends of justice served by excluding the time from
2 May 8, 2025, through August 7, 2025, from computation under the Speedy Trial Act
3 outweigh the best interests of the public and the defendants in a speedy trial. Therefore,
4 and with the consent of the parties,
5

6 IT IS HEREBY ORDERED that the time from May 8, 2025, to August 7, 2025, shall
7 be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(1)
8 (G), (h)(7)(A), (B)(iv).
9

10 IT IS SO ORDERED.
11

12
13 DATED: May 6, 2025
14



HONORABLE WILLIAM H. ORRICK
United States District Court